

## DECLARATION OF JOHN L. SCOTT

I, JOHN L. SCOTT, declare and state as follows:

1. I am employed as an Engineer in the Water Resource Management Group of The Metropolitan Water District of Southern California (Metropolitan). I received my Bachelor of Science Degree in Engineering from the California State University, Northridge, and I am a registered Civil Engineer in the State of California (License No. C51830).

2. Since the beginning of my employment at Metropolitan in 1991, I have been working exclusively on resource matters involving the Colorado River and the Salton Sea. A major portion of my time has been dedicated to issues related to the Imperial Valley, including water use by the Imperial Irrigation District (IID). My experience is in the planning and development of water resource projects, many of which are resources related to the Imperial Valley.

3. Specifically, I contributed to the preparation of the March 1994 *Final Environmental Impact Statement/Environmental Impact Report for the All American Canal Lining Project*, a project that would reduce seepage from the All-American Canal by an estimated 67,700 acre-feet annually. I was a principal author of IID's May 1994 *Final Environmental Impact Report for Modified East Lowline and Trifolium Interceptors, and Completion Projects*, the completion of which was necessary for the full implementation of the water conservation activities implemented by IID with Metropolitan funding pursuant to a 1988 IID-Metropolitan water conservation agreement. In coordination with IID, the Bureau of Reclamation, and the Coachella Valley Water District, I authored the January 2001 multi-agency document entitled *Technical Report of Proposed All-American Canal Reservoir(s) and*

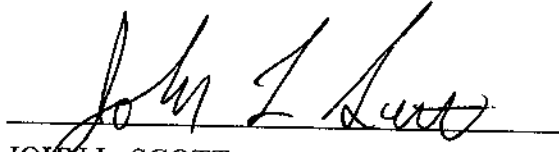
*Associated Facilities Project*, which documented the need for storage capacity near the All-American Canal to conserve Colorado River water. In 2002, I was charged with the responsibility of reading the draft and final versions of the *Environmental Impact Report for the Imperial Irrigation District Water Conservation and Transfer Project* and advising Metropolitan management of its implications to Metropolitan's interests in Colorado River resources. In performing this work during my career, I have frequently traveled to the Imperial Valley, met with IID staff and its other representatives, and have worked cooperatively with IID on numerous projects and initiatives.

4. My opinions, findings and conclusions concerning the matter of water use by IID and opportunities for IID to conserve water are discussed in detail in the following attached memoranda:

- a. May 27, 2003 memorandum to Principal Engineer A. Kirk Dimmitt, Subject: Estimates of tailwater volumes in the Imperial Irrigation District.
- b. May 27, 2003 memorandum to Principal Engineer A. Kirk Dimmitt, Subject: Imperial Irrigation District, diversions, return flows, losses, deliveries, and other related hydrologic data.
- c. May 27, 2003 memorandum to Principal Engineer A. Kirk Dimmitt, Subject: Net diversions by the Imperial Irrigation District with enforcement of its tailwater regulation.
- d. May 27, 2003 memorandum to Principal Engineer A. Kirk Dimmitt, Subject: Previous estimates of Imperial Irrigation District net diversion requirements.

5. The opinions, findings and conclusions detailed in the attached memoranda are based upon my own personal and professional knowledge of and expertise in the matters that are addressed and, if called as a witness, I could and would testify competently thereto.

I declare that the foregoing is true and correct and that this declaration was executed in Los Angeles County, California, on May 28, 2003.

A handwritten signature in cursive script, appearing to read "John L. Scott", is written over a horizontal line.

JOHN L. SCOTT

Engineer  
Water Resources Management  
The Metropolitan Water District  
of Southern California